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SENTIUS INTERNATIONAL, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ZOHO CORPORATION

Plaintiff,

v.

SENTIUS INTERNATIONAL, LLC

Defendant.

SENTIUS INTERNATIONAL, LLC

Counterclaimant,

v.

ZOHO CORPORATION and ZOHO
CORPORATION PVT., LTD.

Counter-Defendants.

Case No: 4:19-cv-00001-YGR

**SUPPLEMENTAL PATENT L.R. 4-3
JOINT CLAIM CONSTRUCTION AND
PREHEARING STATEMENT**

Pursuant to Patent L.R. 4-3, Plaintiff and Counter-defendant Zoho Corporation and Counter-defendant Zoho Corporation Pvt., Ltd. (collectively, “Zoho”) and Defendant and Counter-Claimant Sentius International, LLC (“Sentius”), hereby submit this Supplemental Joint Claim Construction and Prehearing Statement concerning U.S. Patent No. RE 43,633 (hereinafter, the “’633 patent”) and U.S. Patent No. 7,672,985 (hereinafter, the “’985 patent”). This supplemental statement includes two revisions to the primary terms in dispute in Appendix B made by Zoho: the term “beginning position address of [a] textual source material” has been revised to “beginning position address of [a] textual source material stored in an electronic database,” and Zoho’s proposed construction for “image of the source material” / “source material image” has been updated to reflect the briefing. Sentius has also revised its proposed construction of “offset value” and “image of source material/source material image” to further conform to Zoho’s proposed construction.^{1, 2} Appendices A and C are unchanged and included for completeness, other than the title of Appendix C which has been shorted to “Deferred Terms.”

I. Patent L.R. 4-3(a): Agreed Constructions

Constructions of terms on which the parties agree are provided in Appendix A.

II. Patent L.R. 4-3(b) & (c): Proposed Constructions of Disputed Terms and Identification of Most Significant Disputed Claim Terms for Construction

Each party’s proposed constructions of disputed terms, together with an identification of intrinsic and extrinsic evidence, are provided in Appendices B and C. Appendix B includes the ten terms that the parties believe to be most significant to resolution of the case and which they propose for construction at this time. Appendix C includes each parties’ proposed construction for the remaining terms currently in dispute. Per the Court’s December 13, 2019 Order (Dkt.

¹ Sentius has proposed constructions for these terms that were neither briefed nor identified to Zoho until the preparation of this filing. To the extent that the Court is to consider adopting them, Zoho requests an opportunity to respond—in a hearing or additional briefing—and explain why these, like Sentius’s prior proposed constructions, are wrong.

² Sentius’s minor edits to its proposed construction further conform it to track the language of Zoho’s proposed constructions and thereby reduce the issues for the Court to resolve. These minor edits require no further briefing.

46), the parties do not at this time request construction of these terms, but have included them herein to fully comply with the local rules.

III. Patent L.R. 4-3(d): Anticipated Length of Claim Construction Hearing

The parties anticipate, given the number of patents, claims, and claim terms currently at issue, that three (3) hours will be needed for the claim construction hearing.

IV. Patent L.R. 4-3(e): Witnesses

The parties do not intend to call witnesses during the claim construction hearing.

V. Patent L.R.4-3(f): Factual Findings Requested

Sentius requests factual findings from the Court on the following terms: look-up table, means for compiling the source material image from the at least the plurality of discrete pieces, means for converting the display address of the selected discrete portion to an offset value from the beginning position address and parsing one or more documents (or source documents) to identify at least one term based on at least one (or one or more) rule (or predetermined rules).

Zoho requests factual findings regarding the lack of sufficient structure corresponding structure for the means-plus function terms currently in dispute.

Dated: March 18, 2020

Respectfully submitted,

MARTON RIBERA SCHUMANN & CHANG LLP

By: /s/ Phillip J. Haack
Phillip J. Haack

Attorneys for Plaintiff and Counter-defendant Zoho Corporation and Counter-defendant Zoho Corporation Pvt., Ltd.

Dated: March 18, 2020

Respectfully submitted,

SETH LAW OFFICES

By: /s/ Sandeep Seth
Sandeep Seth

Attorneys for Defendant and Counterclaimant SENTIUS INTERNATIONAL, LLC

ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, Phillip J. Haack, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of March 2020, in San Francisco, California.

/s/ Phillip J. Haack

Phillip J. Haack